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Growing Alaska Through Responsible Resource Development

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November 3, 2010

Mr. Forrest Cole, Forest Supervisor  
USDA Forest Service  
648 Mission Street  
Ketchikan, AK 99901

Re: Integrated 5-Year Vegetation Plan: 2010-2014

Dear Mr. Cole:

The Resource Development Council (RDC) appreciates the opportunity to submit comments on the Integrated 5-Year Vegetation Plan for the Tongass National Forest. RDC urges the Forest Service to restore the 2008 timber sale schedule and to continue to work with the forest products industry and the State of Alaska on a 5-year schedule that provides sufficient economic timber sales to sustain the industry and allow it to capture the harvest levels allowed in the 2008 Tongass Land Management Plan (TLMP).

RDC is a statewide membership-funded organization founded in 1975. Our Alaskan membership is comprised of individuals and companies from Alaska's oil and gas, mining, timber, tourism, and fisheries industries, as well as Alaska Native corporations, local communities, organized labor, and industry support firms. RDC's purpose is to link these diverse interests together to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC supports full implementation of TLMP, including making available lands that were designated as "suitable and available." TLMP took years to compose and was to represent a new balance for responsible economic development in the Tongass. TLMP assumed traditional timber harvests of mature, old-growth timber would continue to occur and specifically identified over 660,000 acres as "suitable for timber production" on a "sustained-yield basis." The 2008 TLMP was to provide up to 267 million board feet (mmbf) annually, but the latest 5-year schedule averages about 92 mmbf annually. The most recent follows the 2008 schedule, along with four promised 10-year timber sales, that were to provide at least 190 mmbf annually. The proposed schedule cuts that volume nearly in half.

The reduced volume in the new schedule appears to be a direct consequence of the Forest Service avoiding timber sales of old-growth stands in roadless areas. Half of the timber scheduled for harvest in the 2008 TLMP is in old-growth stands within roadless areas – again lands specifically identified in TLMP as “suitable for timber production.” The Forest Service’s actions to avoid roadless areas may violate its own regulations exempting the Tongass from application of the roadless rule and the promises made by the Department of Agriculture in the settlement agreement with the State of Alaska on roadless litigation. In our view, the avoidance of timber sales in roadless areas is essentially a de facto application of the roadless rule.

Overall, the new schedule makes available only 25 percent of the forest lands that were designated for harvesting under the 2008 TLMP. Another quarter of the TLMP scheduled forest lands hold young-growth timber that will not be physically or economically ready for harvest for 20 to 40 years. While RDC supports creating more jobs in young-growth areas, such as commercial thinning to facilitate future harvests, this should complement traditional timber harvests of mature stands, rather than prematurely substituting for them.

Overall, two-thirds of the timber sales in the current schedule are non-economic and will not support growth in the industry or new jobs in the region. In fact, the actual volume of economic timber that may become available under this schedule will likely be too low to support the single, medium-size sawmill currently remaining in the forest.

It is apparent that project level changes in *Standards* and *Guidelines* are needed to enhance timber sales to the point where they are economic and allow the industry to grow to levels envisioned in the 2008 TLMP. RDC recommends the Forest Service make these changes, and we believe they can occur without compromising the environment or harming wildlife. In addition, RDC urges the Forest Service to complete the 10-year timber sales as promised, where 150 to 200 mmbf were to be made available each year.

In closing, RDC fully supports the October 27, 2010 comments of the Alaska Forest Association (AFA) on this issue, as well as the “Forest Timber Sale Schedule for Young-Growth and Integrated Service Timber Contract Plan.” RDC strongly supports a timber sale schedule that will support long-term jobs, a self-sustaining forest products industry, and a perpetual timber supply from commercial forest lands in the Tongass.

Thank you for the opportunity to comment on the new schedule.

Sincerely,



Carl Portman  
Deputy Director